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September 29, 2020

The Honorable Mitch McConnell
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The Honorable Charles Schumer
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**Re: Restarting the Paycheck Protection Program with
Improvements to Support Black and other Minority-Owned Micro Businesses**

Dear Congressional Leaders:

Start Small Think Big is a nonprofit organization that, through a network of volunteers, provides free legal, financial and marketing services to under-resourced small business entrepreneurs. We write on behalf of the undersigned individuals and pro bono partner organizations, including the following law firms, community-based organizations, and educational institutions: Lowenstein Sandler LLP, Centro Community Partners, the Chester County Chamber of Business & Industry, ICA Fund Good Jobs, Kiva, La Cocina, the Latino Economic Development Center, the Low Income Investment Fund (LIIF), Main Street Launch, Metro New York Chapter of the National Black MBA Association, the Mission Economic Development Agency (MEDA), Opportunity Fund, Pacific Community Ventures, Paul, Weiss, Rifkind, Wharton & Garrison LLP, Root & Rebound, SFMade, Volunteers of Legal Service (VOLS), Working Solutions and the named educators and students of the New York University School of Law, Rutgers Law School, Stanford Law School and UC Berkeley School of Law.

This year alone¹, volunteer lawyers have assisted more than 1,200 small businesses as part of our legal program. Of these clients, 81% are micro businesses, which we define as employing 10 or fewer employees. Seventy-six percent of our clients are minority-owned businesses, of which 42% are Black-owned. Specifically, in collaboration with our pro bono partners, we have provided over the past six months limited scope legal consultations to 740 small businesses impacted by COVID-19 through a Rapid Response Program. In over 450 of these consultations, we have advised on issues relating to Paycheck Protection Program ("PPP") loans. Throughout our work, we and our partners have had an opportunity to listen to clients. We have gained a unique understanding of small businesses' urgent need for funding relief, and of the challenges that under-resourced small businesses, and Black-owned businesses in particular, have encountered in accessing PPP funding.

The PPP closed on August 8, 2020, with over \$130 billion of unused funds remaining in the program. It is clear that the PPP as originally conceived failed to reach many qualified borrowers. Those left behind are overwhelmingly Black-owned and other minority-owned micro businesses operating in marginalized and underbanked communities. With various bills to extend and improve the PPP currently under consideration, we respectfully urge Congress to take decisive action to center minority business owners in any new legislation. In doing so, we ask that Congress prioritize the recommendations we outline below and help ensure equitable access to forgivable PPP loans:

- Renew the PPP and collect demographic data for loan recipients;
- Automatically forgive qualifying loans under \$150,000;
- Earmark funds for micro businesses;
- Tie maximum loan amount to business expenses;
- Enhance spending flexibility; and
- Improve PPP outreach and access.

1. Restart the PPP and Collect Demographic Data

We urge Congress to make available a second round of PPP funding. The renewed program should allow businesses shut out of the original PPP to apply for a first loan, while also permitting second draw loans. Timely access to capital is key to small businesses surviving the ongoing COVID-19 crisis. In a June 2020 Start Small Think Big survey of close to 500 small business owners, 85% of survey respondents reported that they needed funding to maintain their business operation, and 74% reported attempting to access loans and grants during the pandemic. Of that subset, 56% had applied for a PPP loan. The survey inquired as to respondents' ability to survive the crisis at their existing sales capacity: 72% anticipated they could survive only three months more, and 30%, only one month. Of that second group, 35% were Black-owned

¹ Data as of September 1, 2020.

businesses, and 25% Latino-owned businesses.² We are encouraged by legislative efforts underway across the political spectrum that recognize the critical and urgent need for funding.³ Yet time is of the essence, and with small businesses accounting for 64% of total new private sector job creation,⁴ a solution cannot wait until November.⁵ As long as the capital needs of small businesses in crisis go unmet, they remain at risk of permanent closure.

Crucially, the next iteration of the PPP must be designed with acute awareness of and particularized attention to this country's legacy of racial inequality. Black business owners indeed find themselves contending with the multiple crises brought about by COVID-19 while also continuing to carry the weight of the legacy of anti-Black racism in the United States.⁶ It is abundantly clear that they are at risk of collapsing under that weight. In the Start Small Think Big survey referenced above, 40% of survey respondents reported that business sales had completely stopped since March 2020; of those, 41% identified as Black/African American.⁷ Of respondents who reported attempting to secure PPP funding, 37% received the full amount requested, 23% received some of the amount requested, and 40% received no funding. Among those PPP applicants who identified as Black/African American, 51% received no funding.⁸

² In contrast, 15% were white-owned.

³ See, e.g., H.R.6949, Saving Our Street Act; H.R.7740, MICRO Business Success Act; H.R.7894, Paycheck Protection Program Small Business Enhancement Act; H.R. 8087, To amend the Small Business Act and the CARES Act to establish a program for second draw loans and make other modifications to the paycheck protection program, and for other purposes; H.R.7894, Paycheck Protection Program Small Business Enhancement Act; S.4125, Paycheck Protection Program Extension and Modification Act of 2020; H.R.6800, Health and Economic Recovery Omnibus Emergency Solutions Act; and S4321, Continuing Small Business Recovery and Paycheck Protection Program Act.

⁴ U.S. Small Business Administration Office of Advocacy, *Small business Economic Bulletin: April 2020* (April 2020), <https://cdn.advocacy.sba.gov/wp-content/uploads/2020/04/30103025/April-2020-Econ-Bulletin.pdf> (reporting for the period between 2005 and 2019, and accounting for businesses that employ 500 people or less).

⁵ Madeleine Ngo, *Small Businesses are quietly dying by the thousands during the coronavirus pandemic*, Bloomberg News (August 12, 2020), <https://www.chicagotribune.com/business/ct-biz-coronavirus-small-business-failure-20200812-6u5ju4hvcnhv3cbnvslesuvnvq-story.html> (reporting that Yelp Inc. has reported that more than 80,000 businesses permanently closed between March 1 and July 25, 60,000 of them local businesses). Robert Channick, *PPP loans kept many small businesses afloat this summer, Without more funds, experts say a wave of bankruptcies is coming*, Chicago Tribune (September 10, 2020), <https://www.chicagotribune.com/coronavirus/ct-coronavirus-chicago-ppp-small-business-bankruptcy-20200910-khlgodbctfefjkj7q2zhcbr4ti-story.html> (noting that though PPP money maintained certain businesses afloat through this summer, a likely wave of closures is expected after Labor Day).

⁶ Rodney A. Brooks, *More than half of Black-owned businesses may not survive COVID-19*, National Geographic (July 17, 2020), <https://www.nationalgeographic.com/history/2020/07/black-owned-businesses-may-not-survive-covid-19/#close> (noting that research at the University of California, Santa Cruz, and a report by the National Bureau of Economic Research found that 41 percent of Black-owned businesses, accounting for 440,000 firms, were shut down by COVID-19, compared to 17 percent of white-owned businesses). Pedro Nicolaci da Costa, *The Covid-19 Crisis Has Wiped Out Nearly Half Of Black Small Businesses*, Forbes (August 10, 2020).

⁷ In contrast, 27% identified as white.

⁸ In contrast, 37% of unsuccessful PPP applicants identified as white.

The PPP reportedly reached only 20% of eligible businesses in states (and less than 20% of eligible businesses in counties) with the highest densities of Black-owned businesses.⁹ The next iteration of the program must do better. In the interest of equity, transparency and accountability, it is critical that PPP lenders systematically collect and report to the SBA demographic data – race and gender data in particular – with respect to PPP loan and loan forgiveness applicants. It is just as critical that the SBA make such data publicly available. The survival of Black-owned micro businesses calls for renewed PPP lending as well as specific improvements to PPP lending and PPP loan forgiveness that will serve as lifelines to the minority-owned firms that are most vulnerable today.

2. Automatic Loan Forgiveness

In our experience, the uncertainty around loan forgiveness deterred many micro businesses from applying for a PPP loan. Under-resourced entrepreneurs and their pro bono lawyers struggled to stay abreast of the complex, rapidly changing regulations governing the PPP's administration.¹⁰ The PPP forgiveness process must be streamlined to work for the smallest business owners. We recommend that Congress approve automatic and guaranteed forgiveness of all PPP loans under \$150,000 for borrowers who certify that they used the funds for approved purposes.¹¹ Bipartisan support exists for this measure,¹² which we believe would meaningfully increase the number of micro businesses that avail themselves of PPP loans. Notably too, lenders broadly support automatic forgiveness for small loans, citing the cumbersome requirements for forgiveness applications.¹³ Given their size, micro businesses are most likely to borrow in amounts far below \$150,000. Yet a lack of clarity around and barriers to ensuring loan forgiveness foreclose the PPP lifeline for the most at risk small firms. Automatic

⁹ Claire Kramer Mills and Jessica Battisto, *Double Jeopardy: COVID-19's Concentrated Health and Wealth Effects in Black Communities*, Federal Reserve Bank of New York (August 2020), https://www.newyorkfed.org/medialibrary/media/smallbusiness/DoubleJeopardy_COVID19andBlackOwnedBusinesses.

¹⁰ The U.S. Small Business Administration has issued 25 Interim Final Rules regarding the administration of the program. U.S. Small Business Administration, *Paycheck Protection Program*, <https://www.sba.gov/funding-programs/loans/coronavirus-relief-options/paycheck-protection-program>.

¹¹ It is worth noting that as of August 8, 2020, PPP loans of \$150,000 or less (87.4% of the total number of PPP loans extended) accounted for only 28.2% of the total dollar amount lent. U.S. Small Business Administration, *Paycheck Protection Program (PPP) Report* (August 2020), https://www.sba.gov/sites/default/files/2020-08/PPP_Report%20-%202020-08-10.pdf.

¹² *Continuing Small Business Recovery and Paycheck Protection Program Act*, Section 104(1)(1)(A).

¹³ James T. Madore, *Borrowers delay applying for PPP loan forgiveness in hopes of better deal*, Newsday (August 25, 2020), <https://www.newsday.com/business/coronavirus/ppp-loans-forgiveness-small-business-sba-1.48565475> (noting that JPMorganChase for instance supports automatic forgiveness for loans of less than \$150,000). Brandon Anderegg, *WBA pushes for automatic loan forgiveness for small business owners*, BizTimes Milwaukee Business News (August 13, 2020), <https://biztimes.com/wba-pushes-for-automatic-loan-forgiveness-for-small-business-owners/> (noting with respect to loans below \$150,000 that “[...] the level of complexity and paperwork that’s required to be pulled together by borrowers when they apply for forgiveness is so burdensome on that segment of business borrowers that we’d like to streamline the process for them and have this concept of automatic forgiveness.”). John Reosti, *Lenders press Congress to restart — and revamp — PPP*, American Banker (September 8, 2020), <https://www.americanbanker.com/news/lenders-press-congress-to-restart-and-revamp-ppp>.

forgiveness would minimize some of the inequities - social, economic, racial and otherwise - that have plagued the program.

3. Earmark PPP Funds for Micro Businesses

We recommend that adequate PPP funds be reserved specifically for micro businesses. We are encouraged by, and voice our support for, legislative proposals that carve out 25% of existing PPP funds for use by small businesses with 10 or fewer employees.¹⁴ Large firms initially boxed smaller businesses out of initial PPP funding by securing a vast amount of initially available loans before funds ran out.¹⁵ Prompt action by Congress has since been critical in helping to ensure that the most at risk micro businesses could access loans. Despite early interventions, however, this initial non-availability of funds has cast a shadow over the program's fit for very small businesses. Clear communication of available reserved funding for truly small businesses will go a long way in changing narratives around the PPP and bringing those who were initially shut out back to the table. We look forward to continuing to work with the communities we serve to convey that they are heard and centered in these efforts, and to help provide the technical assistance and infrastructure needed to apply.

4. Tie Maximum Loan Amount to Actual Business Expenses

The original PPP design did not reflect the operational realities of the country's smallest businesses. To remedy this problem, we recommend that micro business' maximum loan size be based on their actual business expenses. Under the original program, the maximum loan amount that small business owners with no payroll records (typically self-employed individuals and sole proprietors) could receive was 2.5 months of their reported 2019 net profits.¹⁶ This cash infusion was insufficient to help many micro businesses stay afloat. Many start-up micro businesses do not begin operating at a meaningful profit for years into their development. For business owners who had invested heavily in their new businesses, but had not yet become profitable, the original PPP offered little or no relief.¹⁷

¹⁴ *Health and Economic Recovery Omnibus Emergency Solutions Act*, Section 90001(i)(1).

¹⁵ Sarah D. Wire, *A revamped PPP coronavirus loan program is in the works. Will it help small businesses left out before?* Los Angeles Times (August 12, 2020), <https://www.latimes.com/politics/story/2020-08-12/rte-vamped-ppp-coronavirus-loan-program-is-in-the-works-will-it-help-small-businesses-left-out-before>.

¹⁶ The maximum PPP loan amount otherwise was 2.5 months of average monthly payroll. See U.S. Department of the Treasury, *Paycheck Protection Program: How To Calculate Maximum Loan Amounts – By Business Type* (June 26, 2020), https://www.sba.gov/sites/default/files/2020-06/How-to-Calculate-Loan-Amounts-508_1.pdf. Most of the micro businesses we assisted were owned by self-employed individuals and sole proprietors with no employees.

¹⁷ Center for Responsible Lending, *Congress Must Provide Economic Relief for Small Businesses Owned by People of Color* (May 5, 2020), <https://www.responsiblelending.org/sites/default/files/nodes/files/research-publication/crl-cares-act2-smallbusinesses-may2020.pdf>.

5. Enhance Spending Flexibility

We recommend that Congress dispense with the 60% payroll spending requirement for micro businesses. The SBA itself has acknowledged that: “It may be important to consider that many small businesses have more operation expenses than employee expenses. Our review of data from round one found that tens of thousands of borrowers would not meet the [initial] 75-percent payroll cost threshold and would therefore have to repay the amount of non-payroll costs in excess of 25% in less than 2 years.”¹⁸ An important initial step towards addressing this issue was the reduction in the payroll cost requirement from 75% to 60%. The move however, is simply not enough to reach a large swath of otherwise eligible small businesses for which unaffordable operational costs stand in the way of keeping their doors open, much less, employing workers.¹⁹ Consider, for instance, that for a vast number of micro businesses, overhead expenses—particularly for rent—often greatly surpass payroll expenses.²⁰ We appreciate the important goal of safeguarding employee paychecks in the midst of the pandemic. We also note the need to provide safeguards such that financially well-positioned businesses do not abuse this added flexibility for pure economic gain inconsistent with the legislative intent of the CARES Act. We stress, however, that the current rule does not afford enough flexibility for the smallest businesses struggling to keep their doors open. To realize this recommendation, we recommend that Congress shift the focus of the PPP, with respect to micro businesses, from funding payroll to keeping small businesses alive through the crisis.²¹

We also recommend that Congress expand the scope of allowable PPP non-payroll expenses to better reflect costs incurred by micro businesses. In this regard, we support legislative proposals that would expand eligible non-payroll expenses to cover certain operation costs, property damage costs, supplier costs and worker protective equipment expenditures.²² We strongly encourage Congress to allow PPP funds to be expended for other purposes, such as

¹⁸ U.S. Small Business Administration, Flash Report: Small Business Administration’s Implementation of the Paycheck Protection Program Requirements (May 8, 2020), https://www.sba.gov/sites/default/files/2020-05/SBA_OIG_Report_20-14_508.pdf.

¹⁹ John Lettieri, How Congress Can Fix the Paycheck Protection Program, Economic Innovation Group (April 9, 2020), <https://eig.org/news/how-congress-can-fix-the-paycheck-protection-program> (noting that linkage of PPP relief to payroll necessarily favors stronger financially positioned firms, while leaving firms already struggling to meet a wider range of operational costs at a disadvantage).

²⁰ Various industry groups have supported this recommendation. Lettieri (2020). Timothy L. O’Brian, PPP Isn’t Enough for Black-Owned Businesses, Bloomberg (June 25, 2020), <https://www.bloomberg.com/opinion/articles/2020-06-15/coronavirus-ppp-is-n-t-enough-for-black-owned-businesses>.

²¹ This approach has been endorsed by the Center for Responsible Lending. Center for Responsible Lending, Congress Must Provide Economic Relief for Small Businesses Owned by People of Color (May 5, 2020), <https://www.responsiblelending.org/sites/default/files/nodes/files/research-publication/crl-cares-act2-smallbusinesses-may2020.pdf>. See also, Emily Stewart, The PPP worked how it was supposed to. That’s the problem, Vox (July 13, 2020), <https://www.vox.com/recode/2020/7/13/21320179/ppp-loans-sba-paycheck-protection-program-polling-kanye-west>.

²² H.R. 6800, Health and Economic Recovery Omnibus Emergency Solutions Act, Section 101(a) and (b).

to pay ongoing business costs, compensate independent contractors,²³ refinance existing high interest loans, invest in technological infrastructure to sustain remote work, and pay commercial rental arrears incurred since the onset of the pandemic.²⁴ Current narrow requirements that limit the permissible use of PPP funds have the unintended effect of shutting out the most financially vulnerable firms, particularly Black- and other minority-owned small businesses.

6. Improve PPP Outreach and Access

Finally, we recommend that Congress fund targeted outreach, technical assistance and capacity building to facilitate access to PPP loans in communities that were underserved by the original program. We support proposals to set aside \$250,000,000 in appropriated funds for technical assistance grants to community financial institutions and certain eligible small depository institutions and credit unions.²⁵ We request that this funding route specifically include non-profits, community-based organizations and the Small Business Development Centers, all of which bridge access and information gaps, particularly to Black, underfunded and historically underbanked²⁶ communities. As we call for further PPP funding and recommend the changes outlined in this letter, we worry that too many small business owners, particularly in Black, underfunded and underbanked communities, will learn too little about additional assistance, too late. Dedicated funding for outreach, technical assistance and capacity building will go a long way to servicing businesses most at risk.

²³ Independent contractors and other self-employed individuals face their own uphill battles in securing PPP funds independently and ensuring loan forgiveness. Stewart (2020) (noting business banking relationship barriers, as well as lack of resources, including human resources personnel to navigate PPP paperwork requirements, pose challenges to access to independent contractors). Kate Patrick Macri, *Kabbage rolls out simplified PPP process for Uber drivers, contractors* (June 16, 2020), <https://www.bankingdive.com/news/kabbage-rolls-out-simplified-ppp-process-for-uber-drivers-contractors/579917/>. See also S. 3814, RESTART Act, Section 3(g)(2)(H), proposing that payments made to independent contractors, as reported on Form-1099, be included as an allowable expense under the PPP.

²⁴ The Center for Responsible Lending has also called for an expansion of permitted non-payroll costs to include “necessary ongoing business costs, such as business insurance, inventory, costs associated with vehicles and equipment (loan payments, insurance, maintenance), costs needed to adapt to pandemic, including safety equipment, retrofitting spaces, and payments to 1099 workers, on whom small businesses rely.” Center for Responsible Lending, *Congress Must Provide Economic Relief for Small Businesses Owned by People of Color* (May 5, 2020), <https://www.responsiblelending.org/sites/default/files/nodes/files/research-publication/crl-cares-act2-smallbusinesses-may2020.pdf>. Karen Kerrigan, *Fixing the PPP to Make It Work Better for Small Businesses and Workers*, May 13, 2020, <https://morningconsult.com/opinions/fixing-the-ppp-to-make-it-work-better-for-small-businesses-and-workers/>.

Laura Wronski and Jon Cohen, *What hasn't changed for Black small business owners since the death of George Floyd*, CNBC (August 11, 2020), <https://www.cnbc.com/2020/08/11/what-hasnt-changed-for-black-small-business-owners-since-george-floyd.html> (stating that Black small business owners are more likely than average to be incurring new expenses on coronavirus-related safety measures (63% vs. 54%)).

²⁵ H.R. 6800, Health and Economic Recovery Omnibus Emergency Solutions Act, Section 90001(k)(V).

²⁶ Sifan Liu and Joseph Parilla, *New data shows small businesses in communities of color had unequal access to federal COVID-19 relief*, Brookings Institution, (September 17, 2020), <https://www.brookings.edu/research/new-data-shows-small-businesses-in-communities-of-color-had-unequal-access-to-federal-covid-19-relief/> (noting that initial reliance on traditional lenders for PPP loan disbursements favored those with existing business relationships with large banks, thereby disfavoring Black- and Latino or Hispanic-owned businesses, among others, which tend to be unbanked or underbanked.)

We also recommend the appropriation of additional funding for the SBA itself. The agency is faced with the herculean task of processing an unprecedented number of loan and forgiveness applications. Its ability to respond timely (or at all) to inquiries made by borrowers and pro bono counsel is limited. This has caused borrowers enormous frustration and undermined confidence in the institution by the communities it is meant to serve. Please help the SBA do its job by allowing it to recruit, train and hire additional staff (particularly in customer assistance centers) to meet the historic need for small business support.

* * *

On April 22, 2020, many signatories of this letter communicated to Congress suggestions for improvements to the PPP program designed to ensure equitable access to PPP loans for under-resourced small businesses.²⁷ We are grateful that Congress adopted two of the recommendations outlined then: earmarking a substantial portion of PPP funds for smaller banks, smaller credit unions, and community financial institutions that provide financing to underserved and economically disadvantaged communities, and providing small businesses greater flexibility in how they spend PPP funds. Both of these interventions have helped small business owners in the communities we seek to serve. As the crisis persists, additional action is urgently needed.

The crushing weight of the COVID-19 pandemic, its attendant crises, and the legacy of racism and discrimination is remaking the ecosystem of American business ownership. It is critical that Congress continue to act with urgency to swiftly pass additional financial relief to ensure that this country's smallest businesses survive and thrive. The unique challenges faced by Black and other minority business owners who attempted to secure PPP funding and loan forgiveness brings to light specific opportunities to improve the administration of the program. We encourage Congress to restart and improve the PPP in line with our recommendations based on the documented experiences of Black small business owners, in a manner that advances racial equity and economic opportunity.

Thank you for your consideration of our recommendations.

Sincerely,

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Alex Stepick, Legal Program Director
Stephanie Charles, Cleary Gottlieb Fellow
Start Small Think Big

²⁷ Lowenstein Sandler et al., *Paycheck Protection Program—Safeguards for Nonprofits and Under-Resourced Small Businesses* (April 22, 2020), <https://www.lowenstein.com/media/5764/paycheck-protection-program-safeguards-for-nonprofits-and-under-resourced-small-businesses-weiss-4222020.pdf>.

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Volunteers of Legal Service (VOLS)

Working Solutions

cc:

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